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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RAFAEL ZAMORA,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant-Counterclaimant.

CASE NO. C-13-2186-JD

STIPULATION FOR DISMISSAL AND
ENTRY OF JUDGMENT AND JUDGMENT

Plaintiff, Rafael Zamora, and defendant-counterclaimant, United States of America, hereby stipulate and agree that the complaint in the above-entitled case be dismissed with prejudice, the parties to bear their respective costs, including any possible attorneys' fees or other expenses of this litigation.

It is further stipulated and agreed that judgment may be entered in favor of the United States, and against the Plaintiff, Rafael Zamora, for the balance of the Trust Fund Recovery Penalty tax, penalties and interest assessed against Plaintiff with respect to the employment taxes of RealTime Access Inc. for the 3rd Quarter of 2000 through the 3rd Quarter of 2001, and the 3rd Quarter of 2002, in the amount of \$787,571.78, plus interest accruing after April 16, 2012, pursuant to 26 U.S.C. §§ 6601, 6621, and 6622, and 28 U.S.C. § 1961(c) until paid.

It is further stipulated and agreed that this judgment, along with the terms of the settlement as set

1 forth in the written terms of the settlement, is not an admission of guilt by Plaintiff and is not admissible
2 in any other proceedings, including any criminal proceeding.

3 Plaintiff acknowledges that this judgment, along with the terms of the settlement, does not bind
4 the United States of America in any other proceedings, including any criminal proceeding.

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6 MELINDA HAAG
7 United States Attorney

8 Dated: 8/6/2014

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12 /s/ Cynthia Stier
13 CYNTHIA STIER
14 Assistant United States Attorney
15 Tax Division

16 Dated: 8/5/2014

17 /s/ _____
18 WENDY ABKIN
19 Counsel for Plaintiff, Rafael Zamora

20 SO ORDERED this 6th day of August, 2014.

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JAMES DONATO
United States District Judge